

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

ANDREA WILLIAMS, )  
                        )  
Plaintiff,           )                      Cause No. 4:21-cv-00383-SPM  
v.                     )  
                        )  
NATIONAL CREDIT SYSTEMS, INC., )  
                        )  
Defendant.           )

**DEFENDANT'S CONSENT MOTION FOR LEAVE TO FILE ANSWER OR  
OTHERWISE RESPOND OUT OF TIME**

COMES NOW Defendant, by and through counsel, and for its Consent Motion for Leave to File Answer or Otherwise Respond out of Time, states as follows:

1. On February 11, 2021, Plaintiff filed her Petition in state court.
2. Defendant was served on or about March 1, 2021.
3. Defendant filed its Notice of Removal on March 31, 2021.
4. Defendant's response to Plaintiff's initial pleading was due April 7, 2021.
5. Defendant respectfully requests this Court to grant it leave to file its answer five days out of time. *See* Defendant's Answer attached hereto and incorporated herein as Exhibit 1.

6. Defendant's delay was not intentional or with an attempt to delay these proceedings.
7. Plaintiff will not be prejudiced by the Court granting this Motion.
8. Counsel for the parties have spoken, and Plaintiff consents to the requested relief.

WHEREFORE, Defendant respectfully requests the Court grant Defendant's Consent Motion for Leave to File Answer or Otherwise Respond out of Time, file Exhibit 1 *instanter* upon the granting of this Motion, and for all other relief deemed just and proper.

Respectfully submitted,

**NATIONAL CREDIT SYSTEMS, INC.**

By: /s/ Dennis J. Barton III  
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Attorney for Defendant

**CERTIFICATE OF SERVICE**

Undersigned hereby certifies a true and accurate copy of the foregoing was served on all parties of record via the Court's electronic filing notification system on April 12, 2021.

/s/ Dennis J. Barton III